

KATZMELINGER
370 LEXINGTON AVENUE, SUITE 1512
NEW YORK, NEW YORK 10017
www.katzmelinger.com

Katherine Morales
Katz Melinger PLLC

o: (212) 460-0047
f: (212) 428-6811
kymorales@katzmelinger.com

September 25, 2023

VIA ECF

Honorable Kenneth M. Karas
Unites States District Court
Southern District of New York
300 Quarropas Street, Chambers 533
White Plains, New York 10601-4150

Re: *Huerta et al v. J.D. Workforce, Inc. et al.*
Civil Action No. 7:23-cv-05382

Your Honor:

Our office represents the Plaintiffs in the above-captioned matter. We write pursuant to the Court's Individual Rules of Practice, Rule II.A, and in response to the letter-motion filed by defendants J.D. Workforce, Inc., Hamwattie Bissoon, and Steven Deane, seeking a pre-motion conference in anticipation of their motion to dismiss the Complaint (Dkt. No. 24) (the "Letter-Motion").

As required by the Court's Individual Rules of Practice, Rule II.A, Plaintiffs write to advise the Court that they have reviewed the Letter-Motion, and that Plaintiffs will be filing an Amended Complaint. Plaintiffs respectfully request that they be allowed to file an Amended Complaint by October 17, 2023.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Katherine Morales
Katherine Morales

Cc: All Counsel of Record (via ECF)